



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 15, 2015

James McFadden, Ph.D.  
Directory, Regulatory Affairs  
Wellmark International  
1501 E. Woodfield Rd., Suite 200W  
Schaumburg, IL 60173

Subject: Notice of Extension of Conditional Registration until October 15, 2017 and Label Amendment  
Product Name: RF2187 CDSO Plus II  
EPA Registration Number: 2724-829  
Application Date: October 2, 2015  
Decision Number: 509775

Dear Dr. McFadden:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these

conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

This letter is also in reference to your request to extend the conditional, time-limited registration for the above-referenced registration. The above-referenced registration contains conditions calling for the registration to expire after two years. Additionally, your company is required to adhere to the spot-on label mitigation, and to submit quarterly enhanced incident reports and quarterly sales information for the above-referenced registration.

The Agency has found your company to be in compliance with the terms and conditions for the subject product, and is therefore is granting the request to extend the two-year time-limited registration restriction. As such, the following change is being made to the terms and conditions for the product listed above:

- **The two-year time-limited registration restriction has been extended. The new expiration date for the registration listed above is October 15, 2017.**

Please note that the product is still subject to all other previously required conditions of registration. If your company wishes to remove the time limitations altogether, please submit to the Product Manager an amendment application for the product to change the terms and conditions of the registration. Please include with your submission a written rationale for the removal of the time limitation. As you remember, the Agency included this time limitation as a condition of registration for your product to allow for the post-market surveillance<sup>1</sup> of the product. Therefore, we recommend that you include in your rationale the following information, along with any additional information or analyses you think would be helpful to the Agency (e.g., tables, charts, information on stewardship activities, etc.):

- A summary and analysis of the incidents received associated with the product, including information on the following:
  - A comprehensive analysis of incident rates per doses distributed;
  - An analysis of historical incident trends since the products' release into the marketplace;
  - An analysis of historical incident trends by weight range of animal, breed, weight range of product, etc...
- If the product is also registered in the European Union or Canada, information on incident rates per doses distributed and trends in those countries.

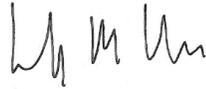
Please also note that requests to remove the expiration date condition are not subject to PRIA fees and do not have to be submitted under PRIA. However, these would also not be considered 90-day fast-track submissions, as the Agency requires time to fully evaluate the information provided. After receiving these submissions, the Agency will consider the incidents received since the initial registration; review the information and rationale provided; and make a decision on the request.

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<sup>1</sup> <http://www.epa.gov/pesticides/health/spot-on-meetings.html>

If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at [gaines.jennifer@epa.gov](mailto:gaines.jennifer@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Urbanski', with a stylized, cursive script.

Jennifer Urbanski, PhD, Product Manager 4  
Invertebrate and Vertebrate Branch 1 (IVB1)  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# RF2187 CDSO Plus II

## SUBLABEL A – APPLICATOR DEVICE PACKAGE

Front Panel:

Font size for word “Dog” in product name must be at least 75% the height of the largest letter in the primary brand name

**Front Panel: For Use only on Toy/Small (5-14 lbs.), Medium (15-30 lbs.), Large (31-60 lbs.), and Extra Large (61-150 lbs.) Dogs/Puppies & 12 weeks of age or older**

**[Flea & Tick [& Mosquito][Treatment] [and] Control only for Dogs and Puppies 12 weeks of age or older]  
DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS.**

**ACCEPTED**  
10/15/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2724-829



Picture <img alt="dog silhouette" data-bbox="229 318 303 372"/>, breed/size appropriate to package

[Each brand name product will be packaged in the weight classes designated below]  
Weighing 5 to 14 lbs./15 to 30 lbs./31 to 60 lbs./61-150 lbs.

**ACTIVE INGREDIENTS:**

Etofenprox ..... 50.00%  
Piperonyl Butoxide\* ..... 9.10%  
N-octyl bicycloheptene dicarboximide (MGK 264) ..... 0.91%  
Pyriproxyfen ..... 0.45%  
(S)-Methoprene ..... 0.23%

**OTHER INGREDIENTS:** ..... 39.31%  
**TOTAL** ..... 100.00%

\*(butyl carbonyl)(6-propylpiperonyl) ether and related compounds

### KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional precautionary statements.

For Dogs and Puppies Weighing:	Net Contents (Each tube)
5 to 14 lbs.	0.204/0.102/0.034 fl. oz. total (1.0 ml.)
15 to 30 lbs.	0.444/0.222/0.074 fl. oz. total (2.2 ml.)
31 to 60 lbs.	0.894/0.447/0.149 fl. oz. total (4.4 ml.)
61 to 150 lbs.	1.482/0.741/0.247 fl. oz. total (7.3 ml.)

EPA Reg. No. 2724-829  
EPA Est. No. 2724-TX-1  
Batch/Lot No. \_\_\_\_



**READ ENTIRE LABEL BEFORE EACH USE**

**IMPORTANT - USE ONLY ON DOGS OR ON PUPPIES 12 WEEKS OF AGE OR OLDER  
DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS (on toy/small  
package only).**

**[Back Panel]**

**Side Effects:** Monitor your dog after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [Brand name] at [phone number].



## **PRECAUTIONARY STATEMENTS**

### **CAUTION**

#### **HAZARDS TO HUMANS**

Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

#### **HAZARDS TO DOMESTIC ANIMALS**

**DO NOT USE ON OTHER ANIMALS.** Do not use on dogs or puppies less than 12 weeks old or weighing less than 5 lbs. Do not use this product on debilitated, aged, medicated, pregnant or nursing animals or on animals known to be sensitive to pesticide products without first consulting a veterinarian. Sensitivity, such as slight transitory redness of the skin at the site of application, may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap, rinse with large amounts of water, and consult a veterinarian immediately.

### **FIRST AID**

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

**HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center, doctor or veterinarian, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxx.

## **DIRECTIONS FOR USE WITH [brand][Smart Shield™] APPLICATOR**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog without using the [brand][Smart Shield™] applicator device, read and follow the Directions for Use For Direct Application to Dog on this package.]

### **USE RESTRICTIONS:**

For indoor use only

Do Not Allow Children to Apply this Product.

Do not apply this product to puppies less than 12 weeks of age.

Do not apply to dogs/puppies weighing less than 5 lbs. (only required for smallest size dog packaging) Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog's/puppy's skin, not to the hair. When applying, use [brand][Smart Shield™] applicator device tip to push aside dog's/puppy's hair to allow direct application to the skin.

RF2187 CDSO Plus II provides a unique [brand][Smart Shield™] applicator device that allows dog/puppy owners to treat their dogs/puppies more securely, and dispose of liquid cartridges [tubes][vials] with less mess.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

**To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial][for each application] with the [brand][Smart Shield™] applicator device.**

### **FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES**

#### 1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

#### 2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open [brand][Smart Shield™] applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the [brand][Smart Shield™] applicator.]

#### 3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube [cartridge][vial] will snap open.

#### 4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of [brand][Smart Shield™] applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number][once] at each of two to three evenly placed spots between the shoulder and the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

#### 5. DISPOSE [icon]

[When finished, hold [brand][Smart Shield™] applicator device over trash.] To dispose of empty tube [cartridge][vial], open [color, e.g. green] door and drop empty tube [cartridge][vial] into trash or offer for recycling if available. [Close [brand][Smart Shield™] applicator device door and store in original package.]

### **FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES**

#### 1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

#### 2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open [brand][Smart Shield™] applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the [brand][Smart Shield™] applicator.]

#### 3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube [cartridge][vial] will snap open.

#### 4. APPLY [icon]

The dog should be standing for easy application. To apply, use [front edge of [brand][Smart Shield™] applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of four or five evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not apply more than 1 vial per application. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

#### 5. DISPOSE [icon]

[When finished, hold [brand][Smart Shield™] applicator device over trash.] To dispose of empty tube [cartridge][vial], open [color, e.g. green] door and drop empty tube [cartridge][vial] into trash or offer for recycling if available. [Close [brand][Smart Shield™] applicator device door and store in original package.]

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name ] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog/s/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 <sup>st</sup> )	Third Treatment Date (30 Days From 2 <sup>nd</sup> )

Reminder: I purchased RF2187 CDSO Plus II from: \_\_\_\_\_

NOTES: \_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

**STORAGE AND DISPOSAL**

**PESTICIDE STORAGE:** Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and pets.

**CONTAINER HANDLING :** Do not reuse empty cartridge [vial][tube]. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**WARRANTY AND CONDITIONS OF SALE:**

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller’s liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To

the extent consistent with applicable law, Seller shall have no liability for consequential damages.

[For more information call our (flea and tick) experts at 1-800-xxx-xxxx ]

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International  
1501 E. Woodfield Road. 200W  
Schaumburg, Illinois 60173  
**[URL]**

**INDIVIDUAL TUBE TEXT**

RF2187 CDSO Plus II [Brand Name]

For Use only on toy/small (5-14 lbs), medium (15-30 lbs), large (31-60 lbs), Extra Large (61-150 lbs) dogs/puppies & 12 wks [of age] or older

Etofenprox 50% PBO 9.1% MGK 264 0.91% Pyriproxyfen 0.45% S-Methoprene 0.23%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Read Directions before use

Range of volumes from 0.034 fl. oz. (1.0 ml) to 0.247 fl. oz (7.3 ml) depending upon weight of dog

EPA Reg. No. 2724-829

[EPA Est. No.]

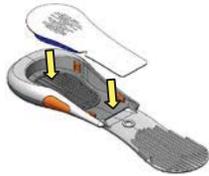
[Batch/Lot No.]



Alternate Sets of ICONS for the RF2187 CDSO Plus II

**[ICON SET 1]**

**[OPEN]**



**[LOAD]**

**[CLOSE]**



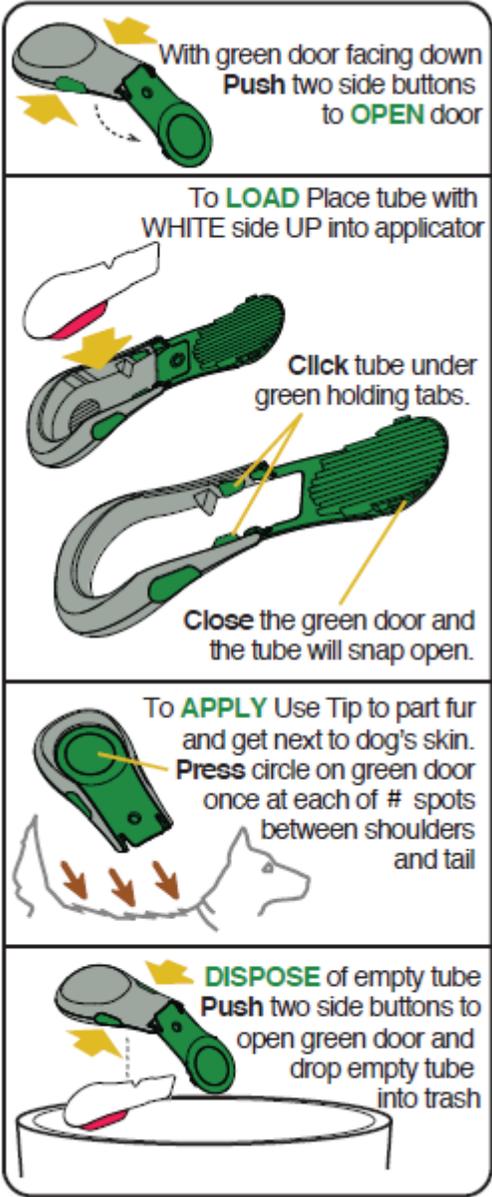
**[APPLY]**



**[DISPOSE]**



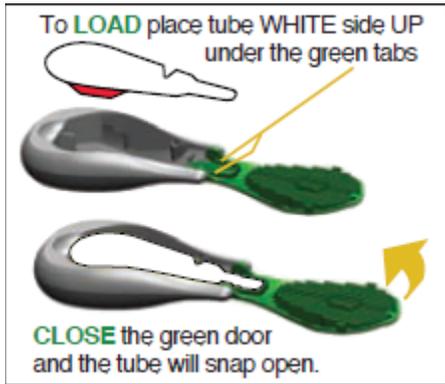
**[ICON SET 2] ALTERNATE ICONS FOR DIRECTIONS FOR USE** (will be specific to dog's/puppy's size)



(“#Spots” is a variable dependent on size)

Door color may change based on brand.

(Alternate LOAD icon)



**[ICON SET 3] ALTERNATE ICONS FOR DIRECTIONS FOR USE** (will be specific to dog's/puppy's size)



(“#Spots” is a variable dependent on size)  
 Door color may change based on brand.

## [2. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY]

(Optional if printed on applicator package)

### **USE RESTRICTIONS:**

For Indoor Use Only

Do Not Allow Children to Apply this Product.

Do not apply this product to puppies less than 12 weeks of age.

Do not apply to dogs/puppies weighing less than 5 lbs. (only required for smallest size dog packaging)

Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application now assumes one [cartridge][tube][vial] per animal per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

**To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial] for each application.**

### **FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES**

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube][cartridge][vial] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to two to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

**FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES**

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [cartridge][vial] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not apply more than 1 vial per application.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube][cartridge][vial] as described in Storage and Disposal

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name ] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 <sup>st</sup> )	Third Treatment Date (30 Days From 2 <sup>nd</sup> )

Reminder: I purchased RF2187 CDSO Plus II from: \_\_\_\_\_

NOTES: \_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

**SUB-LABEL B FOR REFILLPACKAGE**

(For use with [brand][Smart Shield™] applicator device or direct application to dog/puppy without [brand][Smart Shield™] applicator device)

**Front Panel:**

Font size for word “Dog” in product name must be at least 75% the height of the largest letter in the primary brand name

**Front Panel: For Use only on Toy/Small (5-14 lbs.), Medium (15-30 lbs.), Large (31-60 lbs.), and Extra Large (61-150 lbs.) Dogs/Puppies & 12 weeks of age or older**

**[Flea & Tick [& Mosquito][Treatment] [and] Control only for Dogs and Puppies 12 weeks of age or older]  
DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS.**



Picture <img alt="dog silhouette" data-bbox="229 348 303 401"/>, breed/size appropriate to package

[Each brand name product will be packaged in the weight classes designated below]  
Weighing 5 to 14 lbs./15 to 30 lbs./31 to 60 lbs./61-150 lbs.

**ACTIVE INGREDIENTS:**

Etofenprox ..... 50.00%  
Piperonyl Butoxide\* ..... 9.10%  
N-octyl bicycloheptene dicarboximide (MGK 264) ..... 0.91%  
Pyriproxyfen ..... 0.45%  
(S)-Methoprene ..... 0.23%

**OTHER INGREDIENTS:** ..... 39.31%  
TOTAL ..... 100.00%

\*(butyl carbonyl)(6-propylpiperonyl) ether and related compounds

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See back panel for additional precautionary statements.

For Dogs and Puppies Weighing:	Net Contents (Each tube)
5 to 14 lbs.	0.204/0.102/0.034 fl. oz. total (1.0 ml.)
15 to 30 lbs.	0.444/0.222/0.074 fl. oz. total (2.2 ml.)
31 to 60 lbs.	0.894/0.447/0.149 fl. oz. total (4.4 ml.)
61 to 150 lbs.	1.482/0.741/0.247 fl. oz. total (7.3 ml.)

EPA Reg. No. 2724-829  
EPA Est. No. 2724-TX-1  
Batch/Lot No. \_\_\_\_



**READ ENTIRE LABEL BEFORE EACH USE**

**IMPORTANT - USE ONLY ON DOGS OR ON PUPPIES 12 WEEKS OF AGE OR OLDER**

**DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS (on toy/small package only).**

**[Back Panel]**

**Side Effects:** Monitor your dog after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [Brand name] at [phone number].



**PRECAUTIONARY STATEMENTS**

**CAUTION**

**HAZARDS TO HUMANS**

Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

**HAZARDS TO DOMESTIC ANIMALS**

**DO NOT USE ON OTHER ANIMALS.** Do not use on dogs or puppies less than 12 weeks old or weighing less than 5 lbs. Do not use this product on debilitated, aged, medicated, pregnant or nursing animals or on animals known to be sensitive to pesticide products without first consulting a veterinarian. Sensitivity, such as slight transitory redness of the skin at the site of application, may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap, rinse with large amounts of water, and consult a veterinarian immediately.

**FIRST AID**

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

**HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center, doctor or veterinarian, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxx.

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

[To apply the RF2187 CDSO Plus II treatment with the [Brand Name] [Smart Shield™] applicator, use one disposable liquid cartridge [tube][vial][for each application] with the [brand][Smart Shield™] applicator device.]

[Remove one refill tube [cartridge][vial] from the package and insert into opened [brand name] [Smart Shield™] applicator device. Make application according to label directions supplied with the [brand][Smart Shield™] applicator device.] If you need directions for application, please call 1-800-XXX-XXXX.

[However, if you choose to apply directly to dog/puppy without using the [brand][Smart Shield™] applicator device, read and follow the Directions for Use For Direct Application to Dog /Puppy on this package.]

### **(DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY)**

#### **USE RESTRICTIONS**

For Indoor Use Only

Do Not Allow Children to Apply this Product.

Do not apply this product to puppies less than 12 weeks of age.

Do not apply to dogs/puppies weighing less than 5 lbs. (only required for smallest size dog packaging)

Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application now assumes one [cartridge][vial][tube] per animal per application)]

[Note: Each package contains sufficient tubes [cartridges][vials] for [X] applications]

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

**To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial] for each application.**

#### **FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES**

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube][cartridge][vial] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to two to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire

dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..

5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

**FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES**

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube] [cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [cartridge][vial] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not apply more than 1 vial per application.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name ] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 <sup>st</sup> )	Third Treatment Date (30 Days From 2 <sup>nd</sup> )

Reminder: I purchased RF2187 CDSO Plus II from: \_\_\_\_\_

NOTES:\_\_\_\_\_

Treatment table can be expanded based on package size. (6 months)]

**(Precautionary/First Aid and Storage/Disposal) text included)**

**WARRANTY AND CONDITIONS OF SALE:**

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173

OPTIONAL TEXT FOR PACKAGE INSERTS  
OPTIONAL INSERT 1

Dear Valued [Store Customer],

Thank you for your purchase of [Product Name]. [Brand] wants the best for your dog, and we are pleased to share with you some great tips on using the product for the best results.

- A. The [Product Name] comes in 4 different sizes so that the right amount of flea and tick protection is applied to your size dog. Weigh your dog before applying [Product Name] and be sure that the product you purchased is the right size for your dog. Do not apply this product to dogs/puppies younger than 12 weeks. If you have questions, please call 1-800-XXX-XXXX to talk to a product specialist.
- B. For best results, apply [Product Name] evenly to the dog's back in spots starting at the top of the back from the shoulders to the base of the tail. Use two – three spots for toy/small or medium dogs; use four to five spots for large or extra large dogs. At each spot, be sure to apply the product to your dog's skin, not to the surface of your dog's hair coat. For complete instructions on application, please read the package label.
- C. Sensitivities may occur after the use of any topically applied product. A pet's skin is a complex organ, and your pet's skin may be generally sensitive to topical products. Monitor your dog after application, and if you have questions about best results or if your dog experiences a reaction after application, please call 1-800-XXX-XXXX to talk to a product specialist.
- D. When applying [Product Name] make sure not to get this product in your dog's/puppy's eyes or mouth. If you are concerned that your dog may have an oral exposure to [Product Name] please call 1-800-XXX-XXXX to talk to a product specialist.
- E. In households with dogs and cats, the cat will often groom the dog as well as itself. Separate treated dogs from cats for 24 hours after treatment to minimize [reduce potential] oral exposure to your cat.
- F. Treatment of fleas on your pet does not address the 95-99% of the flea population that lives in your house and yard. So even after your dog is treated with [Product Name] and adult fleas are killed, flea eggs may continue to hatch in your home for up to two months. For best results, treat your yard and home for fleas with treatments that contain an Insect Growth Regulator, which kills flea eggs. Over time, treatment of your pet and its environment will eliminate fleas from your home.

OPTIONAL INSERT 2

STOP. Please read this insert/card and the entire instructions before using this product.

[Brand Name] wants the best for your dog/pet, and we are pleased to share with you some great tips for using the product.

- Use [Product Name] only as directed.
- For best results, brush your dog's/pet's coat 24 hours after application.
- Apply away from furniture and carpeting.
- Consult a veterinarian before using if your dog/pet is aged, pregnant, nursing, or taking other medication.

**[Contact a product specialist at 1-800-xxx-xxxx with any questions.]**

## OPTIONAL/ALTERNATE LABEL TEXT

Weighing 5 to 14/15 to 30/31 to 60/61-150 lbs.

(S) Only (for) (Small) Puppies 5-14 lbs.

(M) Only (for) (Medium) Dogs 15-30 lbs.

(L) Only (for) (Large) Dogs 31-60 lbs.

(XL) Only (for) (Extra Large) Dogs 61-150 lbs.

## MARKETING CLAIMS AND OTHER OPTIONAL STATEMENTS

Made in the USA

(Rapidly) (Quickly) eliminates fleas

Kills [(and) (&)] Repels] Mosquitoes, Prevent re-infestation(s) for (28 days)(30 days)(1 month) (4 weeks)

Kills [(and) (&)] Repels] Mosquitoes (before they bite) (for) (28 days) (30 days) (1 month) (4 weeks)

Kills Fleas (that may transmit tapeworm) (for) (28 days) (30 days) (1 month) (4 weeks)(on dogs)

Kills fleas that may cause flea allergy dermatitis (and flea bite anemia) (for) (28 days) (30 days) (1 month) (4 weeks) (on dogs)

Kills Ticks (for) (28 days) (30 days) (1 month) (4 weeks)

Kills Flea Eggs (and Flea Larvae) (for) (28 days) (30 days) (1 month) (4 weeks)

Prevents Flea Eggs from hatching

Kills Brown Dog Ticks (for) (28 days) (30 days) (1 month) (4 weeks)

Kills Deer Ticks (that may carry Lyme disease) (for) (28 days) (30 days) (1 month) (4 weeks)(on dogs)

Kills all biting stages of ticks

Kills [tick nymphs][and][kills][tick larvae]

Kills adult (brown dog) (deer) ticks, nymphs and larvae

Kills [adult] Fleas, Ticks, Flea eggs, (Flea larvae) (through contact)(after contact) (for) (28 days) (30 days) (1 month)(4 weeks)[on your dog]

Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, (Flea larvae) (through contact)(after contact) (for) (28 days) (30 days) (1 month) (4 weeks)

Kills [X] kinds [types] of [pests][bugs]

Controls Flea and Tick infestations (on dogs) (for) (28 days) (30 days) (1 month) (4 weeks)

Helps prevent re-infestation of fleas and ticks (for) (28 days) (30 days) (1 month) (4 weeks)

Helps prevent flea and tick re-infestation (for) (28 days) (30 days) (1 month) (4 weeks)

[Contains [\*InfestStop™] [an Insect Growth Regulator (IGR) to kill flea eggs [and larvae]] and prevent flea development for (28 days) (30 days) (1 month) (4 weeks)]

[Breaks Flea Life Cycle for (28 days) (30 days) (1 month) (4 weeks)]

An important step in breaking the flea life cycle

[Controls flea reinfestation for (28 days) (30 days) (1 month) (4 weeks)]

[With [\*InfestStop™][S-Methoprene] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

\*InfestStop/Infestop™ logo

[Plus][Contains][With] PRECOR® [vIGRen®][S-Methoprene][\*InfestStop™], the first insect growth regulator for flea control

[(S)-Methoprene][\*InfestStop™] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle [at the egg stage]

[(S)-Methoprene][\*InfestStop™] Insect Growth Regulator (IGR) prevents the development of flea eggs into adult fleas and [inhibits the development of flea eggs into adult fleas]

Flea control for dogs with [PRECOR®][vIGRen®] [\*InfestStop™] Insect Growth Regulator (IGR)

[Kills][Prevents][Keeps] flea eggs from hatching for (28 days) (30 days) (1 month) (4 weeks)]

**\*(S)-Methoprene (Must occur on same panel wherever InfestStop™ is used)**

Helps [Keep][Prevent] Fleas & Ticks from [coming back][returning]  
Kills flea eggs and flea larvae to help prevent future [re]-infestations  
Kills all stages of the flea life cycle  
Breaks the flea [and tick] life cycle(s)  
Repels Mosquitoes (before they bite) (for) (28 days) (1 month) (4 weeks)  
Repels Mosquitoes that may transmit West Nile virus (for) (28 days)(1 month) (4 weeks)(on dogs)  
Repels Mosquitoes that may transmit heartworm (for) (28 days)(1 month) (4 weeks)(on dogs)  
Once a month (Monthly) Flea and Tick (Prevention) (Treatment) (Control) (Solution)  
(28 day) (30 day) (1 month) (4 weeks) Flea and Tick (Prevention) (Treatment) (Control) (Solution)  
Prevents flea eggs from developing into biting [breeding] adults (for) (up to) (30 days) (1 month) (4 weeks)  
[Quick drying] formula  
Dries quickly  
Stays on and doesn't rub off  
Spreads with dog's skin oils  
[Brand] works with the biology of your dog [by spreading through the oils of your dog's skin]  
Kills fleas for 30 days (1 month) (4 weeks)  
Prevents (and controls) re-infestation(s)  
Proactive [pet] protection  
Long lasting [formula]  
Effective and convenient topical treatment  
Easy spot on topical [Brand] [Smart Shield™] applicator  
Kills fleas before they have a chance to lay eggs  
Triple Active formula contains one adulticide and two insect growth regulators

#### **NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT**

1<sup>st</sup>/2<sup>nd</sup>/3<sup>rd</sup>/(Xth dose)  
First/second/third (Xth month)  
X-pack/X-tubes  
Value pack  
X month supply/X monthly treatment(s)  
Includes (Brand) (Convenient) (easy to use) [Brand] [Smart Shield™] applicator  
Easy (simple) to use (handle) (apply)  
[brand] More life in their years

#### **[Brand] [Smart Shield™] Applicator Claims**

[Brand] [Smart Shield™] Applicator easily [quickly] gets through dog's fur, for on-skin application  
[Brand] [Smart Shield™] Applicator easily [quickly] penetrates dog's fur, for on-skin application  
[Brand] [Smart Shield™] Applicator glides [smoothly] through the dog's fur  
[Brand] [Smart Shield™] Applicator easily gets through [penetrates] dog's fur to minimize (oily) residue  
[Brand] [Smart Shield™] Applicator features rounded edges for on-skin application  
[Brand] [Smart Shield™] Applicator features an angled tip to help guide the application  
Direct to your dog's skin  
You may bathe your dog 48 hours after application  
To help remind you when you last applied treatment, simply write in the date when each dose is applied:  
[New] contemporary design  
[brand name] [Smart Shield™] [Applicator] helps to prevent getting liquid on [your] hands

[brand name] [Smart Shield™] [Applicator] tip parts hair to help [liquid][application] get down to [the][your][dog's/puppy's] skin  
Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]  
For use with [only][brand name][disposable][liquid dispensing] tubes [pods] [vials] [cartridges]  
[brand name] [Smart Shield™] [applicator][has][provides][allows for][delivers] better grip  
[brand name][provides] re-closable [re-sealable] packaging for [easy] storage  
Closing [the][brand name] [Smart Shield™] [applicator] door automatically opens the [disposable][liquid dispensing] tube [pod][vial][cartridge]  
[brand name] [Smart Shield™] [Applicator] [will not drip after opening]  
[brand name] [Smart Shield™] [Applicator] Won't drip when set down as you go fetch the [your] dog/puppy  
Includes unique [brand] [Smart Shield™] applicator  
Puts the liquid on your dog/puppy – not your hands  
Directs the liquid onto your dog [/puppy] – not your hands  
[Brand] [Smart Shield™] [Applicator] provides a [more confident][secure] application  
Directs the liquid onto your dog [/puppy] – away from your hands  
Applies liquid to your dog's [/puppy's] skin – not yours  
Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet  
[Introducing] [Breakthrough] Convenient, easy to use ACCU-TIP [Brand] [Smart Shield™] [Applicator] [DISPENSER]  
[Easy to use] Longer [Brand] [Smart Shield™] applicator tip for easy application to long-haired dogs/puppies  
[Brand] [Smart Shield™] Applicator patent pending

### **Thermoform claims**

New

New [disposable][liquid dispensing] tube [cartridge][vial][pod]  
(Note tube/vial/cartridge/pod used interchangeably)  
[New] [brand name][disposable][liquid dispensing] [tube][vial][pod] tip [helps][to] spread out liquid [on your][dog/puppy]  
Unique [cartridge] [tube][vial][pod] with flow control  
[no drip][no mess][application][tube][cartridge][vial][pod]

### **Promotional Package Copy**

One month [dose] free  
One free month supply [dose] included  
Bonus pack  
Free [brand] [Smart Shield™] [applicator][tube][vial][cartridge][pod][inside]  
Designed not to drip when set on top of the counter, or table, or other flat surface.  
For use with [brand] [Smart Shield™] applicator  
[Brand][Smart Shield™] Applicator [device] not included  
[brand] Refill Pack [brand] [Smart Shield™] [applicator [device] not included]  
Free [brand] applicator  
Free [brand][Smart Shield] applicator  
[\$x] coupons Save [\$x]  
[\$X] off  
[X%] Off  
[\$X] savings  
[X] [applicator][tube][vial][cartridge][pod][inside]  
Scan [QRcode][here] to learn more  
Scan [QRcode][here] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]  
Visit [website URL] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]  
Win [a free] [prize] [by entering] [at website URL] [visit website URL] [see official rules] [no purchase necessary]  
For official rules visit [website URL]  
Game piece inside  
Enter to win

Buy one [product x] get one [product x] free  
Buy one [product x] get one [product x] [X%][off]  
Buy one [product x] get one [product x] [\$x] [off]  
X [%] [more] [months] [supply] [doses] [tubes] [of protection] [free]

### **Refill Claims**

For use [only] with [brand name] [Smart Shield™] [Applicator]  
([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses  
Easy to use [convenient] refills  
[Can be used with] [Use with] [Brand Name][Smart Shield™] applicator  
[Brand Name (e.g., Adams or Bio Spot, Smart Shield)] [Applicator] [Refills][Refill Pack]  
[Refill Pack] [for][Brand Name] [Smart Shield™] Applicator  
[tube][cartridge][vial][pod] refill pack [refills]  
Refills [Refill Pack] available  
New [refill][tube][cartridge][vial][pod] design

### **Applicator name options (applicator device is used in text)**

Applicator  
Tool  
Device  
Applicator Device  
Application Tool

### **Thermoform name options (tube, cartridge and vial are used in the text)**

Ampoule  
Cartridge  
Packet  
Pod  
Refill  
Tube  
Vial